

David L. Mortensen (#8242)  
Email: [dmortensen@foley.com](mailto:dmortensen@foley.com)  
Tanner B. Camp (#17805)  
Email: [tcamp@foley.com](mailto:tcamp@foley.com)  
Michael A. Manookin (#15667)  
Email: [mmanookin@foley.com](mailto:mmanookin@foley.com)  
Charles D. Morris (#18058)  
Email: [charlie.morris@foley.com](mailto:charlie.morris@foley.com)  
FOLEY & LARDNER LLP  
95 S. State Street, Suite 2500  
Salt Lake City, UT 84111  
Telephone: 801.401.8900

*Attorneys for Pura Scents, Inc*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

PURA SCENTS, INC., a Delaware  
corporation,

Plaintiff,

v.

ATMOS FRAGRANCE, INC., a Delaware  
corporation, KRISTEN KNIGHT, an  
individual,

Defendants.

**STIPULATED MOTION TO EXTEND  
TIME FOR PURA SCENTS, INC. TO  
FILE ITS OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS COMPLAINT PURSUANT  
TO FED. R. CIV. P. 12(B)(6)**

Case No. 2:24-cv-00958-TS-DAO

The Honorable Ted Stewart

Magistrate Judge Daphne A. Oberg

Plaintiff Pura Scents, Inc. ("Pura") and defendants Atmos Fragrance, Inc. and Kristen Knight (collectively, the "Atmos Parties") stipulate and move the Court to extend the deadline for Pura to file its opposition to the Atmos Parties' Motion to Dismiss Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) (ECF No. 13) (the "Motion"), from March 18, 2025 to March 25, 2025. A proposed order is submitted herewith.

Good cause exists for the requested extension. The time to file a response has not expired, and Pura's counsel had a personal emergency that makes meeting the current deadline impractical. Accordingly, Pura needs a short extension to adequately assess and respond to the issues addressed in the Motion. Thus, the parties respectfully request that the Court extend Pura's deadline to file its opposition from March 18, 2025 to March 25, 2025. A proposed order granting the stipulated motion is submitted herewith.

DATED: March 17, 2025

FOLEY & LARDNER LLP

/s/ David L. Mortensen

David L. Mortensen

Tanner B. Camp

Michael A. Manookin

Charles D. Morris

*Attorneys for Plaintiff Pura Scents, Inc.*

DATED: March 17, 2025

KUNZLER BEAN & ADAMSON, PC

/s/ Chad Pehrson (signed with permission)

Chad Pehrson

*Attorneys for Defendants Atmos Fragrance, Inc. and Kristen Knight*